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September 21, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit & Vegetable Programs
AMS, USDA
1400 Independence Avenue, SW
Stop 0237
Washington, DC 20250-0237

Re: Docket No. FV03-925-1PR
Federal Register Vol. 70, No.100, Page 30001
Grapes Grown in a Designated Area of Southeastern California
And Imported Table Grapes; Proposed Change in Regulatory Period
Comments in Opposition to Proposed Change

Dear Docket Clerk:

Barwil Agencies N.A. Inc. opposes the above referenced change in the dates that would expand the restrictions on table grapes from Chile under Table Grape Marketing Order 925. Barwil Agencies N.A. Inc. is a ship agency located in Philadelphia, a tri-state port that benefits greatly from the importation of Chilean grapes.

To change the effective date of the marketing order from April 20 to April 1 will have a combined negative effect on our local port businesses and the U.S. economy as a whole. It would create an artificial shortage of table grapes as there is no other significant or reliable supply source other than Chile.

It is alleged in this proposal that Chilean table grapes arriving in April, in the timeframe prior to when table grapes from the Coachella Valley in California are harvested in significant quantities to meet U.S. consumer demand, are of substandard quality and do not meet the requirements of Table Grape Marketing Order 925. This allegation cannot be substantiated in fact or by USDA records.

In view of the information presented in this matter, Barwil Agencies N.A. Inc., respectfully requests that this proposed rule change be denied by the USDA.

Sincerely,
Steven Nutter
General Manager